



March 07, 2014

**VIA ECFS**

Ms. Marlene Dortch  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

***Re: WC Docket No. 10-90  
Rural Broadband Experiment Expression of Interest  
Errata Filing***

Dear Ms. Dortch:

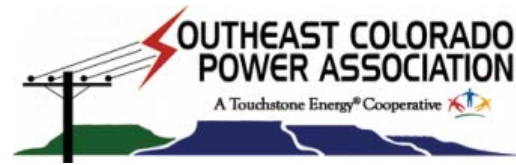
Earlier today an expression of interest was inadvertently filed on behalf of SECOM. This letter corrects, supersedes and replaces that earlier document.

Southeast Colorado Power Association (SECPA) and Southeast Colorado Communications, Inc. (SECOM) herein expresses interest in the Rural Broadband Experiments announced at the January 30<sup>th</sup> FCC Open Meeting. We have specific projects and wish to take this opportunity to document our need for investment in broadband infrastructure. We respectfully ask the Federal Communications Commission to consider our communities' needs when making decisions regarding the Rural Broadband Trials and any future initiatives related to the Connect America Fund.

**Background**

SECPA is a rural electric co-operative formed in 1937 (Rural Electrification Act of 1937) to provide electricity to farmers and ranchers of southeast Colorado hard hit by the Dust Bowl. With the advent of the Internet and the vast economic development opportunities it allowed, SECPA responded to growing community and customer demands in late 1990's by forming SECOM in order to construct and operate high capacity fiber optic networks to provide affordable carrier-grade broadband services throughout its 25,000 square mile service area in southeastern Colorado.

SECOM now offers more than 1,300 route miles of fiber optic broadband and voice services to communities, anchor institutions, wireless providers and other carriers throughout southeastern Colorado, but many anchor institutions and homes in this vast and sparsely populated area – much of which has densities of less than 1 person per square mile and only three of SECOM's 12 counties served have population densities approaching 10 persons per square mile – still require access to affordable and reliable broadband services. SECOM also offers fiber-optic fed high capacity fixed wireless to support affordable and viable broadband service in these extremely remote and hard to



serve areas.

SECOM is a successful recipient of broadband funds. In 2008, SECOPA and SECOM received a USDA Community Connect grant to build fiber from Pueblo, Colorado to Aguilar, Colorado, which lacked broadband service. SECOM now provides broadband (15mpbs) to 106 of Aguilar's 518 residents. SECOM has subsequently extended the build to Trinidad, CO and also offers high capacity low latency broadband service to Walsenburg.

### **Geographic Territory**

SECOM proposes two projects. The first would connect the towns of Kim and Trinidad Colorado with fiber optic. This would bring high capacity service to the communities of Tranchera and Branson who currently receive only traditional copper based telephone service. SECOM currently offers capacities of 30Mbps down/15Mbps up for small businesses for less than \$60 per month and up to 150/75 for less than \$150/month. Residential broadband services start as low as \$20 per month and speeds of 15mbps down and 3mpbs up are available. In addition to bringing high quality service to these areas, completion of this link would result in a fully protected ring for this area of the state thereby increasing reliability of the entire network. The blue line in the figure above shows the proposed Kim to Trinidad Colorado connection.



The second phase of the project involves extending fiber optic-fed high capacity fixed wireless services into the vast and sparsely populated areas where homes, farms, and anchor institutions still require affordable high quality broadband services.

Below is a chart showing the counties within SECOM's service area and eligible high cost and extremely high cost locations. SECOM estimates there are dozens of anchor institutions in this area, many of which are already served by SECOM but still a substantial number SECOM has yet been able to afford the capital costs to serve.

CountyName	Census TractID	Eligible High Cost Locations	Extremely High Cost Locations
Baca	8009964600	745	408
Baca	8009964700	153	82



CountyName	Census TractID	Eligible High Cost Locations	Extremely High Cost Locations
Bent	8011966700	628	201
Crowley	8025969600	458	160
Custer	8027970100	1186	212
El Paso	8041003909	8	3
El Paso	8041004601	24	0
El Paso	8041004602	568	142
El Paso	8041004603	77	15
El Paso	8041005104	1	0
Fremont	8043978100	38	9
Fremont	8043978200	2	0
Fremont	8043978300	33	8
Fremont	8043978400	7	0
Fremont	8043978500	25	4
Fremont	8043978800	7	0
Fremont	8043979000	1644	267
Fremont	8043979100	3	0
Fremont	8043979200	46	8
Fremont	8043979400	45	12
Huerfano	8055960600	9	4
Huerfano	8055960900	690	347
Kiowa	8061960100	81	68
Las Animas	8071000100	343	100
Las Animas	8071000200	2	2
Las Animas	8071000300	5	4



CountyName	Census TractID	Eligible High Cost Locations	Extremely High Cost Locations
Las Animas	8071000400	1	1
Las Animas	8071000500	15	7
Las Animas	8071000800	769	338
Lincoln	8073961700	4	4
Lincoln	8073961800	34	15
Otero	8089968000	60	10
Otero	8089968100	2	1
Otero	8089968200	259	34
Otero	8089968300	118	8
Otero	8089968400	277	98
Otero	8089968500	225	40
Prowers	8099000100	341	66
Prowers	8099000600	171	99
Prowers	8099000700	367	128
Pueblo	8101002806	11	0
Pueblo	8101002906	7	5
Pueblo	8101002918	6	6
Pueblo	8101003106	2	0
Pueblo	8101003200	449	86
Pueblo	8101003600	140	88
Pueblo	8101980100	3	3



### **Proposed Technology: Fiber/Fixed Wireless/VoIP**

SECOM offers:

- a) fiber optic middle mile and
- b) state-of-the-art fixed wireless last mile services including voice over Internet Protocol (VoIP). Our services offer voice and FCC-defined broadband to end users at prices competitive with the highly subsidized incumbent telephone company.

In terms of cost per home passed, no other technology can match the matrix of: a) throughput b) costs and c) time-to-deploy d) low latency (less than 20 milliseconds over the air) of fixed wireless. Furthermore, no other technology can support our First Responders in delivering high bandwidth applications (video, still photos, VoIP, etc) in the remote plains of southeast Colorado.

### **Local and County Government Participation and Support**

SECOM has worked with community anchor institutions, economic development organizations, emergency services providers and schools and others to ensure the highest quality and lowest costs services are provided. SECOM currently serves more than 30 schools and school districts, five community colleges and universities, seven hospitals, eight mental health institutions, fourteen cities and towns (multiple locations), eight county offices (multiple locations), twenty nine sheriffs, police and fire departments in various locations and several offices of the USDA.

As a result, SECOM anticipates strong community support for this project and is confident that local and county governments as well as all affected businesses, anchor institutions and communities will be very supportive. SECOM is more than willing to consider and support strong, locally based public/private partnerships.

### **Existing Providers**

CenturyLink.

### **Project Timeline**

Because SECOM has its own construction assets, and assuming the project is funded within sufficient time to pull necessary permits, etc. SECOM reasonably believes it could begin and complete construction on the 100 mile Kim to Trinidad fiber route in the 2015 construction season (April through November). Fiber optic –fixed wireless hybrid project schedules will depend upon location served, but conceivably can be started in the same construction season depending upon location.

### **Total Cost**



SECOM has successfully built, operated, and offered low cost, very high capacity carrier-grade fiber optic broadband in some of the most expansive and sparsely populated rural areas of the nation for over 15 years. This requires great efficiency and the ability to partner successfully with communities, local governments and county governments in its service territory. It also requires the ability to successfully serve and cooperate with other providers including neighboring rural electric cooperatives. All of these abilities will be brought to bear including planned partnerships with local rural electric cooperatives in these proposed expansions of its broadband network.

### **Investment Needed**

Item	Cost
Fixed Wireless Tower/Base Stations and Customer Premise Equipment (1000 subs)	\$2,800,000
Expansion for Metaswitch VoIP Switch	\$100,000
Expanded Redundant Middle Mile(s)	\$2,500,000
TOTAL	\$5,400,000

Thank you for considering our Expression of Interest in your decisions about the amount of funding that will be allocated in the Rural Broadband Experiments. We commend the FCC in this effort to connect rural communities and are ready to help you close the digital divide.

Sincerely,

Richard Wilson  
General Manager  
Southeast Colorado Power Association